

EXHIBIT 3

Declaration of Gaines Andrews

1. I am currently incarcerated at FCI Oakdale II. My Bureau of Prisons Register Number is 44677379. I previously pleaded guilty to one count of conspiracy to distribute methamphetamine and received a 10-year sentence.

2. I am 39 years old. I am a longtime smoker and I have asthma.

3. I am the head of maintenance and frequently make deliveries to FCI Oakdale I. The prison is building tent camps in the yard. I personally built frames to hold oxygen tanks. We are also building bunk houses and showers for prison guards who are dealing with the outbreak crisis. We are working seven days a week.

4. We do not have enough personal protective equipment. We are able to get masks once per day if we ask, but they are not N95 masks.

5. Prison staff knew about this virus in January. Despite knowing about it, the prison directed maintenance to rip out half of the showers because they wanted to install new ones. The person in charge of building the new showers is retiring today.

6. Many prison guards are quitting or retiring rather than being assigned to FCI Oakdale I.

I, Somil Trivedi, certify that I reviewed the information contained in this declaration with Mr. Andrews by telephone on April 5, 2020, and that he certified that the information contained in this declaration was true and correct to the best of his knowledge.



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